

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ZEN JV, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11195 (JKS)

(Jointly Administered)

**RESERVATION OF RIGHTS OF THE UNITED STATES OF AMERICA
REGARDING THE DEBTORS' COMBINED DISCLOSURE STATEMENT AND
CHAPTER 11 PLAN OF LIQUIDATION**

The United States of America (the “United States”), by and through the undersigned attorneys, files this Reservation of Rights regarding the confirmation of the *Combined Disclosure Statement and Chapter 11 Plan of Liquidation* [Docket No. 305] (“Plan”).

The United States and the Debtors have discussed and agreed upon the inclusion of language in the confirmation order that resolves the United States’ objections to the Plan. Other parties may have comments to the United States’ curative language. Because these discussions are ongoing and a final form of confirmation order is not available currently, the United States reserves any and all rights with respect to the Plan and the final form of the confirmation order.

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N La Salle Street #900, Chicago, IL 60601.

Dated: September 30, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

/s/ Leah V. Lerman
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America*

CERTIFICATE OF SERVICE

I certify that on September 30, 2025, a true and correct copy of the foregoing was served via electronic means through transmission facilities from the Court upon those parties authorized to participate and access the Electronic Filing System in the above-captioned case, and via email to the below parties:

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/s/ Leah V. Lerman
LEAH V. LERMAN